



**MEMO ENDORSED**

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September 3, 2020

**VIA ECF**

The Honorable William H. Pauley, III  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Theresa Harrison v. Port Authority of New York and New Jersey  
United States District Court Case No. 17-cv-06281-WHP

Dear Judge Pauley:

Counsel write jointly on behalf of plaintiff Theresa Harrison and defendant Port Authority of New York and New Jersey in the above-referenced matter and submit this letter to request a one-week extension in which to file the parties' Joint Pretrial Order ("JPTO") and the Pretrial Conference. The current deadline for filing the Pretrial Order is September 10, 2020 and the Pretrial Conference is currently scheduled for September 17, 2020 at 10:30 a.m. This is the parties second request for an extension. No trial date has been scheduled. The reasons for this request are as follows:

Counsel have been diligent to completing the preparation of the joint Pretrial Order. Counsel for Ms. Harrison, however, was required to travel out of state on a client matter during the entire week of August 24, 2020. Lead counsel for Defendant will be on vacation from September 4 through September 9, 2020. As a result, the parties will have extraordinary difficulty completing the JPTO by the date scheduled. The parties have conferred and agree that an extension until September 17, 2020 to submit the JPTO, and for the Pretrial Conference to be rescheduled on a date and time convenient for the Court thereafter would be sufficient to

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complete the final JPTO.<sup>1</sup> This request is for extraordinary good cause, is the parties' second request for an extension to file the JPTO and will not unduly delay the proceedings.

We thank the Court for its consideration.

Very truly yours,

LEECH TISHMAN FUSCALDO & LAMPL

By: Lisa Alexis Jones  
Lisa Alexis Jones

cc: All Counsel of Record (via ECF)

**Application granted. The parties shall submit their joint pre-trial order by September 17, 2020. The parties shall appear for a final pre-trial teleconference on September 30, 2020 at 10:00 a.m. The dial-in number for the teleconference is (888) 363-4749. The access code is 3070580.**

Dated: September 9, 2020  
New York, New York

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.

<sup>1</sup> Counsel for Defendant is unavailable on September 24 and counsel for plaintiff is unavailable on September 25. The parties further request that the Pretrial Conference be held remotely.